

1 THE HONORABLE MARSHA J. PECHMAN
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 OPPENHEIMER & CO. INC.,

12 Plaintiff,

13 v.

14 STEVEN MITCHELL, DORI MITCHELL,
15 JEROME HOPPER, and LORI HOPPER,

16 Defendants.

17 Case No. 2:23-cv-00067-MJP

18 **STIPULATED MOTION REGARDING
19 BRIEFING SCHEDULE FOR MOTION
20 FOR PROTECTIVE ORDER AND
[PROPOSED] ORDER**

21 Note for: April 20, 2023

22 Plaintiff Oppenheimer & Co. Inc. (“Oppenheimer”) and Defendants Steven Mitchell, Dori
23 Mitchell, Jerome Hopper, and Lori Hopper (“Defendants”) (collectively, the “Parties”) hereby
24 stipulate and agree as follows:

25 Whereas, in their Joint Status Report and Discovery Plan, the Parties set forth their
26 disagreement on the appropriate scope of discovery in this action and indicated the anticipated
need for the Court to resolve that dispute. Dkt. No. 51 at 2, 3;

27 Whereas, Defendants recently noticed subpoenas for depositions of third-party witnesses
28 implicating the threshold question of the appropriate scope of discovery. *See* Dkt. Nos. 54 & 55;

1 Whereas, counsel for the Parties have conferred and agreed that it will be most efficient for
 2 the Court to issue an order concerning the scope of discovery prior to the taking of the noticed
 3 depositions;

4 Whereas, the Parties agree to address their dispute regarding the scope of discovery through
 5 the mechanism of Oppenheimer's moving for a protective order; and

6 Whereas, the Parties have agreed on a schedule for the briefing of that motion and also to
 7 reschedule the noticed depositions following the Court's adjudication of that motion, and further
 8 subject to the availability of the third-party deponents;

9 Therefore, the Parties stipulate and agree, and jointly move this Court, for an order
 10 establishing a briefing schedule and deadlines on the forthcoming motion for protective order as
 11 follows:

ACTION	DEADLINE
Oppenheimer's Motion for Protective Order	April 28, 2023
Defendants' Response	May 12, 2023
Oppenheimer's Reply	May 19, 2023
Noting Date (Without Oral Argument)	May 19, 2023

12 *IT IS SO STIPULATED.*

13 Dated: April 20, 2023.

14 Respectfully submitted,

15 **MORGAN, LEWIS & BOCKIUS LLP**

16 By: s/ Andrew DeCarlow

17 Andrew DeCarlow, WSBA No. 54471
 18 1301 Second Avenue, Suite 2800
 19 Seattle, WA 98101

20 Phone: (206) 274-6400

21 Email: andrew.decarlow@morganlewis.com

22 **BRESKIN JOHNSON TOWNSEND
 23 PLLC**

24 By: s/ Roger M. Townsend

25 Roger M. Townsend, WSBA No. 25525
 26 1000 Second Avenue, Suite 3670
 27 Seattle, Washington 98104

28 Phone: (206) 652-8660

29 Email: rtownsend@bjtlegal.com

30 STIPULATED MOTION RE BRIEFING SCHEDULE FOR
 31 MOTION FOR PROTECTIVE ORDER AND ~~PROPOSED~~

32 ORDER – PAGE 2

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1 By: s/ Jason Frank

2 Jason D. Frank (*pro hac vice*)

3 Matthew C. McDonough (*pro hac vice*)

One Federal Street

Boston, MA 02110

Phone: (617) 951-8000

Email: jason.frank@morganlewis.com

5 matthew.mcdonough@morganlewis.com

6 *Counsel for Plaintiff*

10 **LAW OFFICE OF CRAIG KUGLAR,
11 LLC**

12 Craig H. Kuglar (Admitted *pro hac vice*)

13 931 Monroe Drive NE, Suite A102-353

14 Atlanta, Georgia 30308

15 Phone: (404) 432-4448

16 Email: ck@kuglarlaw.com

17 **CHAPMAN ALBIN LLC**

18 John S. Chapman (Admitted *pro hac vice*)

19 200 Hoyt Block

20 700 West St. Clair Avenue

21 Cleveland, Ohio 44113

22 Phone: (216) 241-8172

23 Email: jchapman@chapmanlegal.com

24 **LAW OFFICE OF S. SAMUEL GRIFFIN**

25 S. Samuel Griffin (*pro hac vice* pending)

26 1542 Lavista Road, NE

27 Atlanta, GA 30329

28 Phone: (404) 989-0665

29 Email: Attyinatl@gmail.com

30 *Counsel for Defendants*

[PROPOSED] ORDER

The Parties have stipulated to a briefing schedule for a forthcoming motion for protective order. Upon review of the record, **IT IS SO ORDERED.**

Dated this 20th day of April 2023.

Tana Lin
Tana Lin
United States District Judge